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5 Attorneys for the United States
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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$827.04 SEIZED FROM
PAYPAL ACCOUNT ASSIGNED TO EMAIL
15 GABRIELALVA92@GMAIL.COM,

16 APPROXIMATELY \$8,975.10 SEIZED FROM
DISCOVER BANK ACCOUNT NUMBER
17 7016627348 IN THE NAME OF GABRIEL ALVA,

18 APPROXIMATELY \$885.10 SEIZED FROM
ALLY BANK ACCOUNT NUMBER 1069206298
19 IN THE NAME OF CATHERINE STUCKEY,

20 APPROXIMATELY \$4,984.84 SEIZED FROM
CITI BANK ACCOUNT NUMBER 42011053883
21 IN THE NAME OF CALIFITT, LLC,

22 APPROXIMATELY \$8,686.40 SEIZED FROM
CITI BANK ACCOUNT NUMBER 206269441 IN
23 THE NAME OF CALIFITT, LLC, AND

24 APPROXIMATELY \$445.98 SEIZED FROM
WELLS FARGO BANK ACCOUNT NUMBER
25 2018552089 IN THE NAME OF CATHERINE
STUCKEY,

26 Defendants.
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2:20-MC-00002-TLN-KJN

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

1 It is hereby stipulated by and between the United States of America and potential claimants
2 Gabriel Alva and Catherine Stuckey (“claimants”), by and through their respective counsel, as follows:

3 1. On or about August 6, 7, 9, and 12, 2019, the Homeland Security Investigation (“HSI”)
4 seized the above-referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively
5 “defendant funds”).

6 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
7 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an
8 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of
9 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
10 deadline is January 3, 2020.

11 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
12 March 3, 2020, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
14 forfeiture.

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1 4. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
3 alleging that the defendant funds are subject to forfeiture shall be extended to March 3, 2020.

4 Dated: 12/31/19

McGREGOR W. SCOTT
United States Attorney

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6 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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8 Dated: 1/2/20

/s/ Stephen Kahn
STEPHEN KAHN
Attorney for potential claimant
Gabriel Alva

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10 (Signature authorized by email)

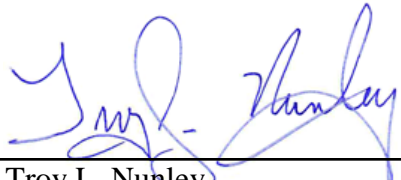
11
12 Dated: 1/2/20

/s/ Candice Fields
CANDICE FIELDS
Attorney for potential claimant
Catherine Stuckey

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14 (Signature authorized by phone)

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17 **IT IS SO ORDERED.**

18 Dated: January 6, 2020

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Troy L. Nunley
United States District Judge